

EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America

Plaintiff

Case No.:11-20129

v

Hon.: ROBERT H. CLELAND

D-4 PATRICK MICHAEL MCKEOUN
Defendant.

/

United States of America,
Plaintiff

v.

Case No. 11-20066

Hon.: ROBERT H. CLELAND

Jeff Garvin Smith, et al.
Defendants

/

NOTICE OF JOINDER BY DISCOVERY GROUP 2

The following Defendants, grouped as members of Discovery Group 2, through their respective attorneys and Liaison Counsel Sidney Kraizman join in these filed motions by Defendant Scott Sutherland D-1:

1. Defendants Ronald Raymond Roberts D-2, Patrick Michael Mckeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Attorney conducted Voir Dire, Proposed Voir Dire, Access to Jury Questionnaire, & Supplemental Questionnaire, *DE 751*.

2. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Government Agents and Law Enforcement Officers to Retain Rough Notes and for Production before Trial, *DE 752*.

3. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Written Proffer and Hearing on Admissibility of Co-Conspirator's Statements Under FRE 801(d) *DE 753*.

4. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Witness List, *DE 754*.

5. Defendants Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Bill of Particulars, *DE 755*.

6. Defendants John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Motion to Strike Surplusage, DE 756.

7. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Early Production of Jencks Materials, DE 757.

8. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Pretrial Disclosure of all Evidence Which the Government intends to Offer Pursuant to Rule 404(b), DE 758.

9. John Renny Riede D-11 joins Defendant Scott Sutherland D-1 in his Motion for Motion to Dismiss, DE 759.

10. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion to Reveal Identity of Informants and Contents of Deals, DE 760.

11. Defendants Ronald Raymond Roberts D-2, Patrick Michael Mckeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion to Produce all Co-Defendants' Statements that the Government Intends Offering in Evidence, DE 761.

12. Defendants Patrick Michael Mckeoun D4, John Renny Riede D-11, join Defendant Scott Sutherland D-1 in his Motion for Severance DE 762.

13. Defendants, Patrick Michael Mckeoun D4, John Renny Riede D-11, and join Defendant Scott Sutherland D-1 in his Motion to Dismiss for Violation of Speedy Trial Act, Violation of Fed. R. Crim. P 48(b) and Defendant Sutherland's Constitutional Right to a Speedy Trial, DE 763.

14. Defendants Ronald Raymond Roberts D-2, Patrick Michael Mckeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion for Order for Disclosure of Expert Witness Testimony, DE 764.

15. Defendants Ronald Raymond Roberts D-2, Patrick Michael Mckeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Motion to Compel Compliance with Standard order of Discovery, Fed. R. Crim P. 16 and to Produce Giglio and Brady Materials before Trial, DE 765.

16. Defendants Ronald Raymond Roberts D-2, Patrick Michael McKeoun D4, John Renny Riede D-11, and Timothy Paul Downs D-16 join Defendant Scott Sutherland D-1 in his Notice of Reservation of Right to Object to Foundation for Exhibits, Chain of Custody and Scientific Analysis, DE 766.

WHEREFORE, the defendants Ronald Raymond Roberts D-2 (represented by Attorney Richard D. Korn), Patrick Michael McKeoun D4 (represented by Attorney Sidney Kraizman), John Renny Riede D-11 (represented by Attorney William Street), and Timothy Paul Downs D-16 (represented by Attorney Joseph Niskar), and by Liaison Attorney Sidney Kraizman for Discovery Group 2 respectfully provides this Notice of Joinder for these Defendants who are grouped within Discovery Group 2.

Respectfully submitted,

/s/ Sidney Kraizman, Esq.
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Dated: May 23, 2014

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2014, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to defense counsel and the following:

AUSA Saima Mohsin
Assistant U.S. Attorney
211 W. Fort St., Ste. 2100
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AUSA Eric M. Straus
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this date: May 23, 2014.

/s/ Sidney Kraizman, Esq.
Signature